



## Superfund and You

### Why Should You Read This Column?

The U.S. Environmental Protection Agency (EPA) began working on the Libby asbestos cleanup in 1999. We know from our interactions with local residents over the years that many of you are very interested in knowing what EPA is or will be doing in the future with regard to cleanup. We also know that many of you want a chance to provide input to the process, but are often unsure about the best ways to do this. Many people in Troy are just beginning to get involved.

Keeping the public up to date and engaged when the technical issues are so complex is challenging. EPA has written fact sheets, hosted public meetings, conferences and workshops, facilitated a Community Advisory Group, provided a Technical Assistance Grant, published regular Q&A ads, maintained an EPA Information Center, and more. As part of our commitment to community awareness and involvement, we will be adding this column. It will run in the *Montanian* and *Western News* on the last Wednesday of each month. We want it to become a resource – a place where interested citizens can look for information on current events and issues that can be influenced by their input.

EPA believes it is important for the community to be involved in the Superfund decision-making process throughout the life of the cleanup project. EPA's staff and its contractors are always open to public input on our decisions and actions. There are also formal public comment periods built into the process where community input can have an impact on cleanup decisions. In 2005, the Superfund process will reach a key decision-making stage – the release of EPA's proposed plan for long-term cleanup. The public comment

period following release of the plan will be an opportunity for residents to review and critique the plan.

Please take a few moments to read this column each month. We will provide timely information and alert you to opportunities to become involved in the process. Upcoming issues tentatively scheduled to be discussed include: overview of the Superfund Process, discussion of what we mean when we say "long-term cleanup," project update, information on a technical workshop for residents, discussion of the Proposed Plan for cleanup in Libby and Troy, and effective ways that you can provide comment to EPA. We welcome suggestions for topics you think would clarify the Superfund process and the public's role in it.

As part of our community involvement process, EPA will be sending out a postcard survey this week. A follow-up survey will be sent out in spring 2006. We hope that the information we obtain from this survey will help us improve the way we provide information and communicate with Libby and Troy residents. The survey is short and should take only a few minutes to complete. We greatly appreciate your participation by returning the postage-paid card to us. If you don't get one and would like to participate, you may pick one up at the EPA Information Center.

We encourage you to call or visit the EPA Information Center at 501 Mineral Ave. with questions or to review information related to the Libby Asbestos Site. You can reach me, Wendy Thoni, EPA's Community Involvement Coordinator, by calling toll free 1-866-457-2690.



# Superfund and You

## The Superfund Process - Part 1

The U.S. Environmental Protection Agency's (EPA's) investigation and cleanup work in Libby is being conducted under the Superfund Law, formally known as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). There are two different authorities or programs under this law, the *Removal Program* and the *Remedial Program*. Removal Program actions are typically cleanups that are begun quickly to address immediate health risks and time-sensitive situations, while Remedial Program actions address both immediate and long-term health risks and are not limited in duration or expenditures. In Libby, EPA is using both programs to continue site investigation, address health risks and conduct cleanup.

### **Removal Program**

In November 1999, EPA began an emergency response action to protect public health in Libby. The first priority was to address current risk to public health from asbestos-contaminated vermiculite by cleaning up, or removing the largest and worst sources of contamination.

EPA issued an Action Memo in May 2000. This decision-document authorized immediate cleanup of source areas based on endangerment. Through that memo (and its amendments), EPA has safely and thoroughly cleaned up the former vermiculite processing facilities, several Libby schools, and 370 residential and commercial properties. This work includes investigation, yard excavation, interior dust cleaning, attic insulation removal, limited demolition, disposal at the mine site and at a special asbestos disposal cell at the landfill, and restoration. EPA expects to complete at least 170 additional cleanups in 2005.

### **Remedial Program**

In October 2002, Libby became a National Priorities List (NPL) site, making it eligible to receive additional federal funds for cleanup. In 2002 and 2003, EPA conducted the Contaminant Screening Study (CSS), taking samples at approximately 4200 residences and businesses in Libby. The data we gathered is being used in the Remedial Investigation and Risk Assessment which EPA is now preparing for Libby.

Drawing on the Remedial Investigation and Risk Assessment, EPA plans to issue a Proposed Plan for remedial action by December 2005. There will be a formal public comment period on the Plan. After considering and responding to public comments, a Record of Decision (ROD) will specify exactly what cleanup activities can and will be done under Superfund. EPA can only do what is authorized in the Action Memo and the ROD.

EPA encourages you to respond to the postcard survey sent out last month. The results will help us improve communication with area residents. If you didn't get one, you can pick one up at the EPA Information Center, at 501 Mineral Ave. The Information Center (293-6194) can be a resource for you if you have questions or would like to review site information. You can also call me, Wendy Thomi, EPA's Community Involvement Coordinator, at 1-866-457-2690 (toll free). Finally, EPA's website for Libby is located at: [www.epa.gov/region8/superfund/libby](http://www.epa.gov/region8/superfund/libby). Next month's column will focus on the Superfund decision-making process in Libby.



# Superfund and You

## The Superfund Process - Part 2

The U.S. Environmental Protection Agency's (EPA's) investigation and cleanup work in Libby is being conducted under the Superfund Law, formally known as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). There are two different authorities or programs under this law, the *Removal Program* and the *Remedial Program*. Last month's column briefly discussed the work EPA is doing in Libby under these two programs.

This month, we're focusing on how the Remedial Program's decision-making process works. In other words, how does EPA decide the scope of the final cleanup in Libby?

Superfund requires a thorough site investigation and risk assessment to ensure that clean-up decisions are based on the best available science. Even at a site where the risk seems clear, anecdotal evidence is not enough. Final clean up decisions must be based on well-defined and documented risk. As in Libby, imminent threats to human health are addressed by emergency cleanups under the Removal Program while the final clean-up decisions are being made.

Steps in the decision-making process are documented in the following way.

- **Remedial Investigation (RI).** EPA collects environmental data necessary to characterize the *nature* and *extent* of the contamination. In Libby, the RI includes the sampling of almost every residence and business (~4,200 properties) as part of the Contaminant Screening Study. The data are currently being analyzed and compiled into an RI report.

- **Risk Assessment (RA).** EPA uses data from the RI to quantify the health risk from the contaminant. In Libby, the focus is on the toxicity of Libby amphibole asbestos, how people get exposed, and how often or for how long they may be exposed.

- **Feasibility Study (FS).** EPA analyzes the protectiveness of clean-up options for a site, using results of the RI and RA. Nine specific criteria are used to weigh the merits of each cleanup option.

- **Proposed Plan.** EPA uses the results of the RI, RA, and FS and other available information to propose a plan for cleanup over the long term. This plan includes Operations and Maintenance. The law requires a public meeting to present the plan during a 30 day public comment period. EPA hopes to issue a Proposed Plan by December 2005.

- **Record of Decision (ROD).** EPA publishes a final cleanup decision document after considering the public comments it receives. The final document includes a Responsiveness Summary which addresses the public comments.

Throughout this process, there will be many opportunities beyond what the law requires for public meetings, discussion, and other communication. and EPA will continue to write these columns, place Q&A ads, meet with residents, and take other steps to make sure the public is informed. All opportunities for public involvement will be announced in the paper.

The EPA Information Center, at 501 Mineral Ave (293-6194) is a resource for you to stay informed.



# Superfund and You

## A Libby Progress Update

### Residential and Business Soil Sampling Results

In 2002, EPA established a program to inspect all properties in Libby for amphibole asbestos contamination and the associated vermiculite that was mined in Libby - *The Contaminant Screening Study*. This study supports the Remedial Investigation to determine the extent of asbestos contamination in Libby. More than 4200 properties were inspected in 2002 and 2003. Some properties required a closer look and were revisited in 2003 and 2004.

Sampling results are intended to classify properties as:

1. Definitely needing cleanup
2. Needing more investigation
3. Likely not needing cleanup

Soils samples were taken on many of the properties and results for over 16,000 soil samples are now available. Home and business owners whose properties were sampled should receive their soil sample results this summer. EPA began mailing the results out in June. If you do not receive your results by the end of summer, please call the Information Center to let us know.

EPA currently estimates that 1,200 to 1,400 properties will need some type of cleanup, depending on the final cleanup plan.

Additional Remedial Investigation sampling at a small number of properties in 2005 is intended to provide EPA with enough information for EPA to propose a protective cleanup approach. EPA will update the community on these ongoing and planned sampling activities at upcoming meetings, through the newspaper and on the radio.

This sampling is aimed at answering specific questions about the effectiveness of the cleanup such as: "How clean are homes several months after the cleanup?" and "How much exposure are people getting from asbestos in soil?"

**When EPA proposes a final cleanup plan, there will be a 60 day formal public comment period. You will be encouraged to provide information or raise issues that will help EPA reach its final decisions about the cleanup.**

### Cleanup Progress

The former vermiculite processing plants and other public areas have been cleaned up. EPA has completed cleanup of 428 residential and commercial properties. Of these, 75 properties have been completed this season, bringing us closer to the goal of 200 cleanups in 2005.

### Economic Benefit

EPA has encouraged contractors to hire locally, whenever possible. During the peak field season, EPA contractors had approximately 90 full-time employees, 61 of whom were from Libby or Troy. During Fiscal Year 2004, EPA estimated that approximately \$8,200,000 of cleanup money was added directly to the Libby-area economy in the form of salaries, benefits, per diem, housing, purchases, contracts, and rentals.

For more information, you can stop by or call the EPA Information Center, at 501 Mineral Ave. (293-6194). The Information Center is a great resource if you have questions or

me, Wendy Thoni, EPA's  
Community Involvement  
Coordinator, at  
1-866-457-2690 (toll free).



# Superfund and You

## CDM: Supporting EPA in Libby

Environmental cleanup, particularly at the Libby Asbestos site, is very complex. Every complicated construction project requires contractor support- both on and off site- to provide additional staffing and expertise to help plan and carry out a variety of tasks. Most people are surprised to find out how much work goes on behind the scenes at Superfund sites.

People often ask about what CDM brings to the cleanup. In Libby, CDM has supported EPA since 1999 on many tasks including: sampling and analysis, data management, engineering support, property specific designs and construction plans, worker health and safety, scheduling and public involvement. These tasks and more must be carefully coordinated to ensure the work meets EPA's technical goals and is responsive to community needs.

CDM staffs the EPA Information Center, which has been a resource for Libby citizens throughout the investigation and cleanup. Their local community involvement coordinators (CICs) facilitate temporary relocation and communication so that residents are informed and involved in the cleanup process. Many of you have met with the CICs and have told us how much you appreciate their help. CDM also provides support to EPA on other outreach activities.

As EPA continues the Remedial Investigation to determine the extent of Libby asbestos contamination across the site, CDM has supported us in some key ways. CDM conducted the Contaminant Screening Study, inspecting and sampling more than 4200 properties. CDM helped EPA develop new, reliable, and cost-effective methods for analyzing the samples. They will support us on additional sampling aimed at understanding more about how people may be exposed to asbestos. This sampling will begin soon.

Specifically, CDM supports EPA's cleanup contractors in the following ways:

- CDM identifies which properties have Libby Asbestos, where it is found and how much is present.
- CDM oversees the tracking of more than 50,000 samples from taking the sample to the time the results go out to the residents.
- CDM develops property-specific work plans that workers follow to clean up each property in the most efficient way possible.
- CDM schedules and manages the cleanup work from start to finish.
- CDM is responsible for making sure health and safety plans are followed so workers remain safe.
- CDM does clearance sampling after the cleanup to ensure the cleanup is complete.

There are 27 long-term CDM team members in Libby now, 10 of whom are local hires. They and their families shop locally, attend local schools and churches, and support local charitable causes.

CDM's project management has been recognized nationally by several prestigious engineering organizations that have given the Team awards for their Libby work.

The Libby cleanup team includes project managers, scientists, data managers, cleanup and oversight contractors, lawyers and community involvement coordinators. EPA, Volpe, CDM and several cleanup contractors must work together in a complex web of activities to ensure that Libby residents get a thorough, high quality cleanup.

If you have questions on CDM's involvement, please visit the EPA Information Center, at 501 Mineral Avenue.



# Superfund and You

## Cabinet View Country Club

### Responding to Reports of Vermiculite

Earlier this year, in response to a recent report of vermiculite found below the sod in a tee box, EPA conducted several sampling events at the Cabinet View Country Club (the Libby golf course) in Libby, Montana. Previously, EPA had received anecdotal reports that vermiculite was used under some of the greens, but no visible vermiculite had been identified during several EPA inspections of surface soils around the golf course.

EPA sampled the golf course's tee boxes, greens, fairways, and sand from the stockpile used for the course's bunkers. The samples results generally indicated that "trace" level contamination ( $<0.2\%$ ) was present in surface soils of the greens and tee boxes, but found no contamination in the sand stockpile or fairways. All sample results were  $<1\%$ , which is EPA's current numerical trigger for emergency response cleanup of soil at residential and commercial properties in Libby. It is important to note that in Libby, EPA does not consider  $1\%$  a "safe" level of asbestos in soils, but it is currently being used to help determine which residential and commercial areas are the highest priorities for cleanup.

### Identifying the Risk

EPA's primary concerns lie with groundskeepers at the golf course that would frequently mow the grass or conduct aeration or other aggressive grounds maintenance activities. In order to understand the potential impacts to golf course users and as part of EPA's Remedial Investigation activities for this summer, personal air samples were collected from

groundskeepers while they conducted activities such as aerating, sweeping and sanding. Some of these sample results indicated asbestos concentrations in the air during aggressive grounds keeping activities. However, these concentrations are below a level of concern in soil and air that is currently being addressed in Libby through the Emergency Response authority under Superfund.

### Long-Term Cleanup Strategy

EPA is working toward publishing a Proposed Plan that includes our long-term strategy for cleanup. Once the final cleanup remedy for the Libby site has been selected the issues at the Cabinet View Country Club will be addressed.

Until that time, while we have verified the presence of Libby asbestos in the tee boxes and greens of the golf course, EPA does not feel the levels present warrant immediate response or other restrictive actions. Users of the golf course should be aware of the presence of contamination, and we will work with the Cabinet View Country Club to ensure this occurs.

### Questions?

For more information, you can stop by or call the EPA Information Center, at 501 Mineral Avenue (406-293-6194). The Information Center is a great resource if you have questions or would like to review information about the site.